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Attorneys for the Plaintiff
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and JOSE JUAN BECERRA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARQUS MARTINEZ et al.,

Plaintiffs,

v.

COUNTY OF SONOMA, et al.,

Defendants.

Case No. 3:15-cv-04574-JD

**JOINT NOTICE OF SETTLEMENT AND
REQUEST TO VACATE JUNE 18, 2018 TRIAL
DATE; [PROPOSED] ORDER THEREON**

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants COUNTY OF SONOMA, STEVE FREITAS, MAZEN AWAD, MICHAEL MERCHEN, DAVID HOUSE, BRIAN GALLAWAY, MARIO ROBLEDO, CHAD MCMASTERS, JASON SQUIRES and JOSEPH MEDEIROS and plaintiffs MARQUS MARTINEZ, DANIEL BANKS, JESUS LOPEZ, MICHAEL ROBERTS, JESSE BRUCKLACHER, RIGOBERTO CABRERA and JOSE JUAN BECERRA have reached a settlement in this case. The settlement was conditioned on the County obtaining necessary Board approval and excess carrier approval.

All necessary approvals now have been obtained. The parties have agreed on language contained in a written settlement agreement and release and all that remains is to obtain signatures of the parties, which include seven (7) plaintiffs that are located in various cities throughout California. Therefore, the parties anticipate obtaining necessary signatures and then then filing a stipulated dismissal within 45 days.

Based on this settlement, Plaintiffs and Defendants respectfully request that the Court vacate the June 18, 2018 trial date.

Dated: June 13, 2018

BERTRAND, FOX, ELLIOT,
OSMAN & WENZEL

By: /s/ Richard W. Osman

Richard W. Osman

Attorneys for Defendants

COUNTY OF SONOMA, STEVE FREITAS,
MAZEN AWAD, MICHAEL MERCHEN,
DAVID HOUSE, BRIAN GALLAWAY,
MARIO ROBLEDO, CHAD MCMASTERS,
JASON SQUIRES, ROBERT TRAVELSTEAD,
and JOSEPH MEDEIROS

1 Dated: June 13, 2018

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2 By: /s/ John H. Scott

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4 Lizabeth N. de Vries

Attorneys for Plaintiffs

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JESUS LOPEZ, MICHAEL ROBERTS, JESSE
6 BRUCKLACHER, RIGOBERTO CABRERA
and JOSE JUAN BECERRA

8 Dated: June 13, 2018

LAW OFFICES OF IZAAK D. SCHWAIGER

9 By: /s/ Izaak D. Schwaiger

10 Izaak D. Schwaiger

Attorneys for Plaintiffs

11 MARQUS MARTINEZ, DANIEL BANKS,
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14
15 **ELECTRONIC CASE FILING ATTESTATION**

16 I, Richard W. Osman, am the ECF user whose identification and password are being used to file
17 the foregoing documents. Pursuant to Civil Local Rule 5.1(i), I hereby attest that concurrence in the
18 filing of these documents has been obtained from each of its signatories.

19
20 Dated: June 13, 2018

BERTRAND, FOX, ELLIOT,
OSMAN & WENZEL

21 By: /s/ Richard W. Osman

22 Richard W. Osman

[PROPOSED] ORDER

GOOD CAUSE APPEARING THEREFORE, the June 18, 2018 trial date in this matter is vacated and the parties are ordered to file a Stipulation for Dismissal by July 28, 2018.

IT IS SO ORDERED.

Dated: _____

HON. JAMES DONATO
United States District Judge